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10 *Sergio Bustos, Gabriel Lopez,*
Jose Valencia, Allen Bowman, and
11 *Emmanuel Ramirez*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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17 **JESSICA BOLTON,**

18 Plaintiff,

19 v.

20 **DANIEL PARAMO, MARCUS POLLARD,**
21 **SERGIO BUSTOS, GABRIEL LOPEZ,**
22 **JOSE VALENCIA, ALLEN BOWMAN,**
EMMANUEL RAMIREZ, AND DOES One
23 **through Fifty,**

24 Defendants.

Case No: 4:21-cv-3466-YGR

**STIPULATION AND ORDER FOR
EXTENSION TO COMPLY WITH
COURT'S ORDER ON DISCOVERY –
Dkt. 112**

Magistrate Judge: Lisa J. Cisneros

Trial Date: July 29, 2024

Action Filed: May 8, 2021

25 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:
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- 1 1. Whereas the Court on February 1, 2024 issued a Minute Order (ECF No. 112) regarding
2 discovery issues raised in a joint letter (ECF No. 104).
- 3 2. Whereas the Minute Order ordered Defendants Paramo, Bowman, Pollard and Lopez to
4 complete the following process no later than February 15, 2024: (1) carefully review his
5 deposition notice; (2) diligently search for responsive documents in any place such
6 documents might reasonably be found, including at least—but not limited to—personal
7 email accounts, text messages, and any flash drives, other devices, or documents
8 retained from his employment at CDCR; (3) produce any responsive documents found
9 through that search to Plaintiff; and (4) produce a declaration to Plaintiff attesting that
10 he has taken the foregoing steps and produced all responsive documents found. (ECF
11 No. 112)
- 12 3. Whereas on February 14, 2024, Defendants served upon Plaintiff declarations from
13 Paramo, Bowman and Pollard.
- 14 4. Whereas Defendant Gabriel Lopez needs additional time to comply with the
15 aforementioned Court’s Minute Order, and requests a two-week extension to February
16 29, 2024.
- 17 5. The parties have met and conferred and hereby stipulate that Defendant Gabriel Lopez’s
18 deadline to comply with the Court’s Minute Order (ECF No. 112) be extended to
19 February 29, 2024.

20 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**
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1 Dated: February 15, 2024

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California

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5 /s/ Lydia Ko
6 MICHAEL PURCELL
7 LYDIA V. KO
8 Deputy Attorney General
9 *Attorneys for Jose Valencia; Gabriel Lopez;*
10 *Allen Bowman; Emmanuel Ramirez; Sergio*
11 *Bustos; Marcus Pollard; and Daniel Paramo*

12 Dated: February 15, 2024

LAW OFFICE OF WENDY MUSELL

13
14 /s/ Wendy Musell
15 WENDY MUSELL
16 *Attorneys for Plaintiff Jessica Bolton*

17 **IT IS SO ORDERED**

18 Dated: February 16, 2024

19 
20 Lisa J. Cisneros
21 UNITED STATES MAGISTRATE JUDGE

22 OK2021900154

23 Stip and PO for Ext on Ct Order No 112.docx

24 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all
25 signatories have concurred in the filing of this document.
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